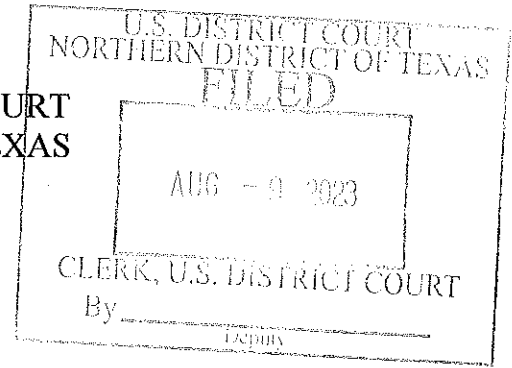


**SEALED**

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No.

TYLER-ROBIN DOYLE (01)  
JOHN KENNEDY FRENCH (02)

**4-23CR-237-P**

INDICTMENT

The Grand Jury Charges:

Introduction

1. At all times relevant to the conspiracy, the defendant **Tyler-Robin Doyle, John Kennedy French**, and Robert Thurston Aldridge, were residents of the Northern District of Texas.
2. At all times relevant to the conspiracy, the United States Postal Service (USPS) Enterprise Payment Systems ("EPS") online program services were hosted by Amazon Web Services with servers located in California. As a result, all EPS account refund requests were routed through the servers located in California.
3. The U.S. Postal Service (USPS) offers a mail services prepayment program to customers called the Enterprise Payment Systems ("EPS"). EPS provides customers a convenient way to pay and manage their mailing services via a single account. EPS accounts are managed through an internet portal online. Customers deposit funds into their EPS accounts, and the funds are available to be applied to mail products and services.

4. Customers are also able to create “refunds” or withdrawals of unused funds from the account online. Once the refund is generated, a check is mailed from Eagan, Minnesota to the address on the account. At the time of the offense, the EPS system had a float period, such that deposited checks would typically take 30 days to clear. As a result, customers who deposited fraudulent or insufficient-funds checks into EPS accounts would have their EPS accounts credited immediately. They could then request refunds from the EPS online portal, and the USPS would send a refund before the customer’s previously deposited check was recognized as a bad check.

Count One  
Conspiracy to Commit Wire Fraud  
(Violation 18 U.S.C. § 371 (18 U.S.C. § 1343))

5. Paragraphs 1-4 of this Indictment are realleged and incorporated by reference as though fully set forth herein.
6. Beginning on an unknown date and continuing into on or around July 21, 2022, in the Fort Worth Division of the Northern District of Texas, **Tyler-Robin Doyle** and **John Kennedy French**, together with Robert-Thurston Aldridge, did knowingly and willfully combine, conspire, confederate and agree with one another, and with others known and unknown, to commit wire fraud, in violation of 18 U.S.C. § 1343, that is, to knowingly devise and execute a scheme to defraud and to obtain property by means of materially false pretenses, representations, and promises, using and causing the transmission of wire communications in interstate commerce in furtherance of the scheme.

*Object of the Conspiracy and Scheme to Defraud*

7. It was the object of the conspiracy for Doyle, French, and Aldridge to obtain money by opening USPS EPS accounts via the Internet; depositing fraudulent, insufficient checks into those USPS EPS accounts; and then immediately begin requesting withdrawals via the Internet from the USPS EPS accounts before the fraudulent, insufficient nature of the deposited checks was discovered.
8. As a result of the conspiracy, the coconspirators fraudulently received or attempted to receive \$5,566,999.00 in US Currency via checks from the USPS.

*Manner and Means of the Conspiracy and the Scheme to Defraud*

9. It was part of the conspiracy and the scheme to defraud that **Doyle, French,** and Aldridge, agreed to deposit fraudulent, insufficient checks into USPS EPS accounts, and then request withdrawals from the EPS account before the fraudulent, insufficient nature of the checks was discovered.

10. It was further part of the conspiracy and scheme to defraud that **Doyle, French,** and Aldridge wrote checks for deposit into the EPS accounts on a bank account once belonging to Aldridge that was closed in 2021, and a second bank account once belonging to **Doyle** that was closed in 2021.

11. It was further part of the conspiracy and scheme to defraud that **Doyle, French,** and Aldridge each took fraudulent, insufficient checks from these closed bank accounts to the Jack Watson Post Office located at Mark IV Parkway, Fort Worth, Texas, for deposit into an EPS account.

12. It was further part of the conspiracy and scheme to defraud that **Doyle** and Aldridge deposited the checks into the online EPS accounts created by **Doyle** and **French**.

13. It was further part of the conspiracy and scheme to defraud that **Doyle, French,** and Aldridge requested refunds of the deposited funds via the EPS online portal and were sent refund checks in the mail by the USPS.

14. It was further part of the conspiracy and scheme to defraud that **Doyle, French,** and Aldridge deposited the USPS refund checks into open bank accounts they controlled.

*Overt Acts*

15. In furtherance of the conspiracy and to effect the illegal object thereof, in the Northern District of Texas and elsewhere, **Doyle, French,** and Aldridge committed the following overt acts, among others:

- a. On or about July 16, 2022, **Doyle** deposited a fraudulent, insufficient check for \$247,000 on a USPS EPS account at the Jack Watson Post Office.
- b. On or about July 18, 2022, **Doyle** deposited four (4) fraudulent, insufficient check totaling \$2 million dollars on a USPS EPS account at the Jack Watson Post Office.
- c. On or about July 19, 2022, **Doyle** deposited four (4) fraudulent, insufficient check totaling \$2 million dollars on a USPS EPS account at the Jack Watson Post Office.
- d. On or about July 19, 2022, Aldridge sent **Doyle** a text message with an image of a check written to the post office in the amount of \$999,999.00 USD. On July 21, 2022, **French** attempted to deposit that check for \$999,999.00 into an EPS account at the Jack Watson Post Office.
- e. On July 19, 2022, Aldridge sent **Doyle** a text message with an image of an USPS check Aldridge received as a refund from an EPS account in Aldridge's name.


- f. On or about July 20, 2022, **French** and **Doyle** exchanged text message conversations regarding the Business Customer Gateway, which is the initial step in creating an EPS account, with **French** asking **Doyle** how to answer one of the questions asked by the Business Customer Gateway. The following day, July 21, 2022, **French** created an EPS account.
- g. On or about July 20, 2022, **Doyle** processed multiple online refund requests of funds deposited into various EPS accounts in an amount totaling \$232,507.14.
- h. On or about July 26, 2022, two USPS checks, totaling \$4,000 were delivered to **Doyle**'s residence and later cleared through a financial institution.

All in violation of 18 U.S.C. § 371 (18 U.S.C. § 1343).

A TRUE BILL.

  
FOREPERSON

LEIGHA SIMONTON  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
BRANDIE WADE  
Assistant United States Attorney  
Texas State Bar No. 24058350  
801 Cherry Street, Suite 1700  
Fort Worth, Texas 76102  
Telephone: 817.252.5200  
Facsimile: 817.252.5455  
Email: brandie.wade@usdoj.gov

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

---

THE UNITED STATES OF AMERICA

v.

TYLER-ROBIN DOYLE (01)  
JOHN KENNEDY FRENCH (02)

---

INDICTMENT

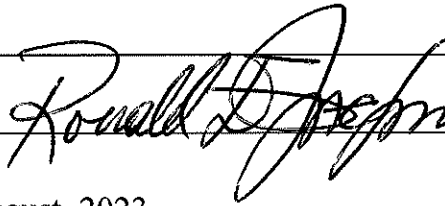
18 U.S.C. § 371 (18 U.S.C. § 1343)  
Conspiracy to Commit Wire Fraud  
Count 1

---

A true bill rendered

---

FORT WORTH



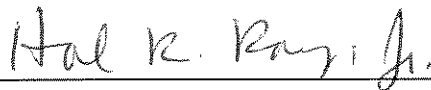
FOREPERSON

Filed in open court this 9th day of August, 2023.

---

**Defendant (01) on Conditions of Pretrial Release; Defendant (02) Warrant to Issue**

---



UNITED STATES MAGISTRATE JUDGE

Magistrate Court Number: 4:22-MJ-781-BP